



Neighborhood and Community Services
Weatherization Program
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Kansas City, Missouri, 64106

**CITY OF KANSAS CITY MISSOURI COMMENTS ON THE MISSOURI
DEPARTMENT OF NATURAL RESOURCES PY 2008 STATE PLAN**

**Robert T. Jackson, Manager, Property Preservation Division
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Kansas City applauds numerous changes proposed in the 2009 Program Year (PY 08) Weatherization Assistance Program State Plan. The implementation of the mobile home energy audit (MHEA) tool along with the BPI training and certification strategy can only strengthen Missouri's energy efficiency improvement and energy affordability outcomes.

MDNR should be recognized for its commitment in successfully leveraging utility funds for weatherization throughout the state. These efforts over past years have also resulted in educating utility companies and the Missouri Public Service Commission on the value of energy efficiency to the utility ratemaking and rate approval process.

We understand that there may be several program evaluations in the new program year. The evaluation process will increase program management. As important as evaluations are, we should be mindful in the ways the evaluations can affect program operations. Evaluations typically require extensive data collection; oftentimes it is data that is not being collected at the time.

With the required and agreed to emphasis on enhanced service delivery, combined with the economical impact of high-energy prices to low-income families, we have reservations in regards to the wisdom of the proposed plan to re-review weatherization work for the last two program year periods. There is an increasing need to address the health, safety and affordability of program applicants. Given the urgency of need, we find it counter-productive to revisit noted past performance issues. This review may well result in fewer benefits delivered to new applicants. The revisit may also create questions regarding cost and liability. The proverbial "is it a failure of the program or the client" cannot result in a positive outcome.

As expected by DNR, the Missouri weatherization network has a long-term commitment and investment in the weatherization program. The investment is demonstrated by participation in BPI and other DNR sponsored training. The network has experienced turnover of institutional knowledge both in the technical and administrative areas. Additional but necessary training to educate new staff takes significant time away from program production.. Given these issues and concerns, our recommendation is that we move forward and not expend time revisiting past work already reviewed and approved.

Thank you for outlining the proposed changes in the state plan. The outline permits us to focus on the pertinent areas of the plan. Lastly, thank you for this opportunity to comment on the plan
